

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION**

John Doe, )  
                  )  
Plaintiff,     )  
                  )  
v.               ) No. 2:22-CV-4164 SRB  
                  )  
Advanced Correctional Healthcare, Inc., et al., )  
                  )  
Defendants.    )

**JOINT MOTION FOR PROTECTIVE ORDER**

COME NOW the parties, by and through their undersigned attorneys of record, and pursuant to Fed. R. Civ. P. 26(c)(1) move this Court for issuance of a Protective Order providing for discovery of confidential records and other sensitive information only on specified terms and conditions and restricting the use and dissemination of such records or information secured through formal or informal discovery in this case. As grounds for their Motion, the parties jointly state to the Court as follows:

1. This is a lawsuit in which Plaintiff advanced federal civil rights claims concerning Defendants.
2. Because of the sensitive nature of the issues in this case, Plaintiff is using a pseudonym to protect his identity.
3. The parties anticipate they will exchange information and take depositions concerning sensitive or confidential issues.
4. The production of these documents and tangible things, and the taking of depositions, will be impaired and hindered by the lack of an appropriate Protective Order controlling the use, dissemination, and disclosure of these materials and information.

5. Realizing that a Protective Order would be beneficial to the parties and the discovery process, the parties have reached an agreement with regard to an appropriate Protective Order concerning these documents and information. The parties' proposed Protective Order, pursuant to this Court's guidelines, was electronically submitted in Word format to the Court.

6. Pursuant to Fed. R. Civ. P. 26, this Court has the authority to issue the requested Protective Order.

WHEREFORE, based upon the above and foregoing, the parties respectfully move this Court to enter a Protective Order in the form submitted electronically to the Court, together with such other and further relief as this Court deems just and appropriate.

Respectfully submitted,

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